

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA, ex rel.
CAMERON JEHL,**

Plaintiffs,

v.

**GGNSC SOUTHAVEN LLC D/B/A GOLDEN
LIVING CENTER-SOUTHAVEN; GGNSC
ADMINISTRATIVE SERVICES LLC D/B/A
GOLDEN VENTURES; AND GGNSC
CLINICAL SERVICES LLC D/B/A GOLDEN
CLINICAL SERVICES,**

Defendants.

No. 3:19-CV-091-MPM-JMV

DECLARATION OF CLIFF JOHNSON

1. My name is Cliff Johnson. I am over eighteen years of age and have personal knowledge of the matters set forth in this Declaration.

2. I am an Assistant Professor of Law and the Director of the Roderick and Solange MacArthur Justice Center at the University of Mississippi School of Law. I joined the faculty in 2014 after being selected as the first Director of the MacArthur Justice Center's Mississippi office. As Director, I oversee all of the MacArthur Justice Center's Mississippi litigation efforts—which are focused on criminal justice and civil rights issues—and provide instruction and supervision to law students participating in the MacArthur Justice Clinic.

3. Prior to joining the faculty, I practiced law in Mississippi for more than 20 years. I was admitted to the Mississippi Bar in 1992 after receiving a Juris Doctor degree from Columbia University School of Law in 1992 and a Bachelor of Arts degree from Mississippi College in 1989. I served as a law clerk to the Hon. William H. Barbour, Jr. (1992-1993); then worked in

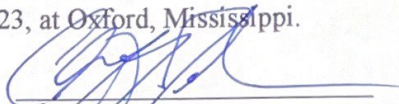
private practice as an associate at Butler, Snow, O'Mara, Stevens & Cannada (1993- 1996); then served as an Assistant U.S. Attorney for the Southern District of Mississippi (1996- 2001); and then returned to private practice as a shareholder and founding partner of Pigott & Johnson, P.A. (2001-2014), handling a variety of complex civil and criminal matters. During 2005-2006, I was a Fulbright Scholar at the Raoul Wallenberg Institute for Human Rights and Humanitarian Law and Lund University School of Law in Sweden where I taught Law and History of the American Civil Rights Movement.

4. I have been honored as one of the "Top 40 Under 40" (2003) by the Mississippi Business Journal, as a "Mid-South Super Lawyer" (2011-2014), as a National Trial Lawyer of the Year (2016) by Public Justice, and as one of the "Best Lawyers in America" (2017). I also was presented with the Inspector General's Integrity Award by the United States Department of Health and Human Services (1997).

5. Much of my private practice involved False Claims Act *qui tam* cases. While I was with the U.S. Attorney's office, much of my work involved health care fraud. During those times, I became familiar with the lawyers who handle False Claims Act *qui tam* cases in Mississippi both on the relator's side and the defendant's side. Although I do not practice in that area today, I still keep up with that area of litigation and remain familiar with many of the lawyers who handle such cases at the present time.

6. Accordingly, I am able to identify a number of lawyers in practice in Mississippi during the past five years (2018-2023) with the experience and skill to defend complicated False Claims Act *qui tam* cases. These include Scott Gilbert and Rusty Comley at Watkins & Eager, Amanda Barbour at Butler Snow, Mike Dawkins and Scott Newton at Baker Donelson, and Mark Hodges at Wise Carter.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of May, 2023, at Oxford, Mississippi.


Cliff Johnson